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November 18, 2019

Via ECF

Hon. Edgardo Ramos

United States District Judge

Thurgood Marshall United States Courthouse

40 Foley Square

New York, NY 10007

MEMO ENDORSED

USDC SDNY

DOCUMENT

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DOC # _____

DATE FILED: November 18, 2019

Re: Caridad Hichez v. Saul
19 Civ. 5493 (ER)

Dear Judge Ramos:

I am joining Mr. Kuznicki as co-counsel for the plaintiff in the above-captioned case. I write to request an extension of time in which to file plaintiff's Motion for Judgment on the Pleadings. Plaintiff's papers are due to be filed today. This is plaintiff's first request for an extension of time.

Due to workload considerations, we are behind schedule in preparing Mr. Caridad Hichez's case and cannot complete our preparation today. We regret that we need to seek additional time to prepare these papers. With the kind consent of opposing counsel, Emily Fishman, Esq, I request the following revised schedule:

December 18, 2019	Plaintiff's Motion for Judgment on the Pleadings
February 17, 2020	Defendant's Opposition. Cross-Motion for Judgment on the Pleadings
March 10, 2020	Plaintiff's Reply Brief
March 30, 2020	Defendant's Reply Brief

Thank you for Your Honor's attention to this matter.

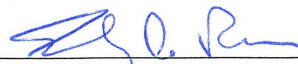
Very truly yours,

/s/ Christopher J. Bowes
Christopher J. Bowes, Esq

cc: AUSA Emily Fishman
Assistant Regional Counsel
SSA/Office of the General Counsel – Region II
26 Federal Plaza, Room 3904
New York, NY 10278
Attorney for Defendant

David Kuznicki, Esq.
Attorney for plaintiff

The application is X granted
_____ denied


Edgardo Ramos, U.S.D.J

Dated: November 18, 2019

New York, New York